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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

VEG CORP. INC.,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

Case No. 2:17-cv-02893-JCM-NJK

~~[PROPOSED]~~ STIPULATION AND
ORDER TO EXTEND DEADLINE FOR
REPLY TO PETITIONER'S PETITION TO
QUASH AND TO EXTEND DEADLINES
FOR OPPOSITION AND REPLY
BRIEFING TO RESPONDENT'S
PETITION TO COMPEL

(First Request)

Petitioner Veg. Corp., Inc. ("Veg Corp" or "Petitioner") and Respondent United States of America ("Respondent" or "United States"), by and through their undersigned counsel, hereby stipulate and agree to extend the time for briefing on Veg Corps' Petition to Quash Formal Document Request and the United States' Counter Petition to Compel Compliance with Formal Document Request.

The Internal Revenue Service ("IRS") is conducting an audit examination of Veg Corp's corporate income tax return for the year 2013. In connection with the examination, the IRS issued several Information Document Requests ("IDR") to Veg Corp. On August 21, 2017, the IRS issued a Formal Document Request to Veg Corp under 26 U.S.C. (IRC) § 982(c)(2) in which it contended that Veg Corp's responses to the IDRs were insufficient or incomplete. On November 17, 2017, Veg Corp filed a petition to quash the Formal Document Request issued by the IRS to Petitioner

1 ("Petition"). In response, on May 18, 2018, the United States filed a motion to deny the Petition, as
2 well as a counter petition to compel compliance with the Formal Document Request ("Petition to
3 Compel").

4 Reply briefing to the Petition and opposition briefing to the Petition to Compel are due on
5 June 1, 2018.

6 As a result of scheduling conflicts and the complicated nature of the subject matter, it is
7 hereby stipulated and agreed between the parties, pending Court approval, that Veg Corp shall have
8 up to and including **June 15, 2018** in which to file its reply to the Petition and its opposition to the
9 United States' Motion to Compel. Furthermore, the United States shall have up to and including
10 **June 29, 2018** in which to file its reply to the Motion to Compel. The parties respectfully request
11 that this Court approve the foregoing stipulation.

12 IT IS SO STIPULATED.

13 DATED this 25th day of May, 2018

14 /s/ DONALD L. PRUNTY
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DATED this 25th day of May, 2018

14 /s/ HENRY C. DARMSTADTER
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23 **ORDER**

24 **IT IS HEREBY ORDERED**

25 DATED May 29, 2018

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28 **UNITED STATES DISTRICT COURT JUDGE**